



RQ-3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 13, 2003

Thomas C. Roberts, Treasurer
Van Ness Feldman PC Political Action Committee
(AKA Van Ness Feldman Political Action Committee)
1050 Thomas Jefferson Street, NW, Suite 700
Washington, DC 20007

Identification Number: C00205369

Reference: Amended 30 Day Post-General Report (10/16/02-11/25/02), received 12/5/02

Dear Mr. Roberts:

This letter is to inform you that as of March 12, 2003, the Commission has not received your response to our request for additional information, dated February 20, 2003. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by April 2, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Brandy Phillips on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20510

RQ-2

Thomas C. Roberts, Treasurer
 Van Ness Feldman PC Political Action Committee
 (AKA Van Ness Feldman Political Action Committee
 1050 Thomas Jefferson Street, N.W., Suite 700
 Washington, DC 20007

FEB 24 2003

Identification Number: C00205369

Reference: Amended 30 Day Post-General Report (10/16/02-11/25/02), received
 12/5/02

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report discloses a \$4,000 payment to your connected organization for candidates (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

-Schedule B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a non-monicandidate political committee and its affiliates, from making a contribution to a candidate for federal office in

VAN NESS FELDMAN PC POLITICAL ACTION COMMITTEE (AKA VAN NESS

FELDMAN POLITICAL ACTION COMMITTEE

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excess of \$1,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

If your committee has met the criteria for multicandidate status, please file FEC FORM 1M "Notification of Multicandidate Status" with the Commission. The treasurer must file FEC FORM 1M prior to making a contribution of more than \$1,000 per candidate per election. 11 CFR §102.2(a)(3)

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at

VAN NESS FELDMAN PC POLITICAL ACTION COMMITTEE (AKA VAN NESS
FELDMAN POLITICAL ACTION COMMITTEE

PAGE 3

the prompt press 1, then press 2 to reach the Reports Analysis Division). My local
number is (202) 694-1130.

Sincerely,



Brandy Phillips
Campaign Finance Analyst
Reports Analysis Division

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**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for items covered by the Detailed Disbursement Page	FOR LINE NUMBER: (check only one)	Page 25 of 25
	<input type="checkbox"/> 21a <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27	
	<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27	

Any information copied from such Reports and Supplements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in full)

Van Ness Feldman, P.C. Political Action Committee

FBI Name (last, first, middle initial)

a. **Van Ness Feldman, P.C.**

Mailing Address: **1050 Thomas Jefferson St., NW Suite 200**

City: **Washington** State: **DC** Zip Code: **20004**

Purpose of Disbursement:

In-kind contribution to Max Baucus for Senate Candidate

Candidate Name:

Max Baucus

Office sought: House Disbursement For: Primary General
 Senate Other (Specify): **Food**
 President

State: **MT** District: **2nd**

FBI Name (last, first, middle initial)

Date of Disbursement:

53 26 2001

Amount of Each Disbursement this Period:

\$1,314.00

b. **Siemens for Congress**

Mailing Address: **2916 West Drive**

City: **Blackfoot** State: **ID** Zip Code: **83221**

Purpose of Disbursement:

Contribution to Mike Simpson for House Candidate

Candidate Name:

Mike Simpson

Office sought: House Disbursement For: Primary General
 Senate Other (Specify): **Food**
 President

State: **ID** District: **2nd**

FBI Name (last, first, middle initial)

Date of Disbursement:

53 26 2001

Amount of Each Disbursement this Period:

\$1,000.00

c. **J.D. Hayworth for Congress**

Mailing Address: **10283 N. 9th Street, Suite 100**

City: **Scottsdale** State: **AZ** Zip Code: **85256**

Purpose of Disbursement:

Contribution to J.D. Hayworth for House Candidate

Candidate Name:

J.D. Hayworth

Office sought: House Disbursement For: Primary General
 Senate Other (Specify): **Food**
 President

State: **AZ** District: **1st**

Date of Disbursement:

53 26 2001

Amount of Each Disbursement this Period:

\$500.00

Signature of Disbursement this Period (optional):

TOTAL this Period (last page this line number only):

FEC Schedule B (Form 3X) (Rev. 10-97)

SEARCHED

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 3/3
	<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25	
	<input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 29 <input type="checkbox"/> 28	

Any information included in this Report and Statement may not be sold or used by any person for the purpose of soliciting contributions, or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE OR POLITICAL ACTION COMMITTEE
Van Name Feldman, P.C.

Full Name (Last, First, Middle Initial) A Max Edwards		Date of Disbursement 04/18/2002	
Street Address 203 C Street, NE City Washington State DC		Zip Code 20002	
Purpose of Disbursement		Amount of Each Disbursement This Period \$60.00	
Candidate Name		Category of Type	
Office Bought: State: NT	House X Gentle President Other:	Disbursement Per: Primary <input checked="" type="checkbox"/> General Other (specify) <input type="checkbox"/>	Checkbook/Line ID: SB23-6428

G

Subtotal of Disbursements This Page (optional)	\$60.00
TOTAL This Period (use same line numbers with)	\$60.00

FEC Schedule B (Revised 12/2001)

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedules for each category of the Detailed Itemized Payment	FOR LINE NUMBER Identify one:	PAGE 5/6
	<input type="checkbox"/> 21a <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25	
	<input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 29	

Any information displayed on such Reports and Statements may not be edited or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Van Ness Feldman, P.C.

Full Name (Last, First, Middle Initial)		Date of Disbursement	
A. Van Ness Feldman, P.C.		10/16/2002	
Mailing Address 1050 Thomas Jefferson Street, NW City Washington State District		Amount of Each Disbursement this Period	
Purpose of Disbursement		1000.00	
Candidate Name Max Baucus		Category/ Type	
Office Bought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement Per: 2002 Primary <input checked="" type="checkbox"/> General Other (Specify) <input type="checkbox"/>	Transaction ID: 5B23.4543	
State: MT District: 3		Date of Disbursement	
Full Name (Last, First, Middle Initial)		10/17/2002	
B. Van Ness Feldman, P.C.		Amount of Each Disbursement this Period	
Mailing Address 1050 Thomas Jefferson Street, NW City Washington State District		1000.00	
Purpose of Disbursement		Category/ Type	
Candidate Name Mark, Ralph	Disbursement Per: 2002 Primary <input checked="" type="checkbox"/> General Other (Specify) <input type="checkbox"/>	Transaction ID: 5B23.4540	
State: NH District: 3		Date of Disbursement	
Full Name (Last, First, Middle Initial)		10/18/2002	
C. Van Ness Feldman, P.C.		Amount of Each Disbursement this Period	
Mailing Address 1050 Thomas Jefferson Street, NW City Washington State District		500.00	
Purpose of Disbursement		Category/ Type	
Candidate Name College, Susan	Disbursement Per: 2002 Primary <input checked="" type="checkbox"/> General Other (Specify) <input type="checkbox"/>	Transaction ID: 5B23.4544	
Office Bought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	State: NC District:	2000.00	
CUSTODY ALL of Disbursements This Page (optional):			
TOTAL This Period (last page this number will be: FEC Schedule B (Revised 1/2001)			

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category on the Detailed Summary Page	FOR LINE 400 & 600 check only one	PAGE 6/8
	<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 29	

Any information copied from such Reports and Statements may not be used or used by any person for the purpose of defaming candidates or for commercial purposes, other than using the name and address of any political committee to make contributions from such committee.

NAME OF COMMITTEE (or PAC)

Van Ness Feldman, P.C.

FULL Name (Last, First, Middle Initial)

A. Van Ness Feldman, P.C.

Mailing Address

1050 Thomas Jefferson Street, NW

City

Washington

State

DC

Zip Code

20007

Purpose of Disbursement

Candidate Name

Van Hollen for Congress

Category/
Type

Office Sought: House
 Senate
 President

Disbursement For: 2002
Primary General
Other (Specify):

State: DC District: 8

Date of Disbursement

10/26/2002

Amount of Each Disbursement this Period

600.00

Transaction ID: SB284641

FULL Name (Last, First, Middle Initial)

B. Van Ness Feldman, P.C.

Mailing Address

1050 Thomas Jefferson Street, NW

City

Washington

State

DC

Zip Code

20007

Purpose of Disbursement

Candidate Name

Mary Landrieu

Category/
Type

Office Sought: House
 Senate
 President
State: LA District:

Disbursement For: 2002
Primary General
Other (Specify):
Runoff

Date of Disbursement

11/04/2002

Amount of Each Disbursement this Period

1000.00

Transaction ID: SB28463P

C.

SUMTOTAL of Disbursements This Page (optional) ➤ 1500.00

TOTAL This Period (last page (no line number only)) ➤ 4000.00

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